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Attorneys for Defendants and Cross-Defendants  
CATLIN SPECIALTY INSURANCE COMPANY,  
GREENWICH INSURANCE COMPANY, and XL  
INSURANCE AMERICA, INC.

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

**EMPLOYERS MUTUAL CASUALTY  
COMPANY, an IOWA CORPORATION,**

**Plaintiff,**

**v.**

**ZURICH AMERICAN INSURANCE  
COMPANY, an ILLINOIS  
CORPORATION; CATLIN SPECIALTY  
INSURANCE COMPANY, a DELAWARE  
CORPORATION; GREENWICH  
INSURANCE COMPANY, a DELAWARE  
CORPORATION, XL INSURANCE  
AMERICA, INC., a DELAWARE  
CORPORATION and DOES 1 through 250,  
inclusive,**

**Defendants.**

Docket No.: 2:18-cv-00089

**JOINT MOTION TO EXTEND  
DEADLINE FOR DEFENDANTS AND  
CROSS-DEFENDANTS CATLIN  
SPECIALTY INSURANCE COMPANY,  
GREENWICH INSURANCE COMPANY,  
AND XL INSURANCE AMERICA, INC.,  
TO RESPOND TO ZURICH AMERICAN  
INSURANCE COMPANY'S CROSS-  
COMPLAINT**

**(FIRST REQUEST)**

Defendants and Cross-Defendants CATLIN SPECIALTY INSURANCE COMPANY,  
GREENWICH INSURANCE COMPANY, and XL INSURANCE AMERICA, INC., (collectively  
“Cross-Defendants”) by and through their attorneys, DUANE MORRIS LLP, and Defendant

1 ZURICH AMERICAN INSURANCE COMPANY (“Zurich”), by and through its attorneys,  
2 MORALES FIERRO & REEVES (collectively, “the Parties”), jointly request that this Court grant  
3 this Joint Motion, in compliance with LR IA 6-1 and LR 7-1, and provide Cross-Defendants with a  
4 two-week extension of time, until **March 29, 2018**, to file a responsive pleading to Zurich’s Cross-  
5 Complaint.

6 In support of this Joint Motion the Parties state:

- 7 1. On February 22, 2018, Zurich filed a Cross-Complaint against Cross-Defendants;
- 8 2. Counsel for Cross-Defendants need additional time to evaluate the claims in the  
9 Cross-Complaint, retrieve and analyze client documents, and prepare a responsive  
10 pleading;
- 11 3. Accordingly, on March 12, 2018, counsel for Cross-Defendants, Tyson E. Hafen, and  
12 counsel for Zurich, Ramiro Morales, spoke by telephone and Mr. Morales agreed to  
13 Mr. Hafen’s request for a two-week extension;
- 14 4. Specifically, the parties agreed to extend the deadline for Cross-Defendants to  
15 respond to Zurich’s Cross-Complaint from March 15, 2018 to March 29, 2018;
- 16 5. No party in this action will be prejudiced by permitting Cross-Defendants to have an  
17 extension of time to file a responsive pleading to Zurich’s Cross-Complaint.

18 WHEREFORE, the Parties respectfully request that the Court grant a two-week extension of  
19 time, until **March 29, 2018**, to allow Cross-Defendants to file a responsive pleading to Zurich’s  
20 Cross-Complaint.

21 MORALES FIERRO & REEVES

DUANE MORRIS LLP

22  
23 By /s/ Ramiro Morales  
24 Ramiro Morales, SBN 7101  
25 Attorneys for ZURICH AMERICAN

By /s/ Tyson E. Hafen  
Tyson E. Hafen, SBN 13139  
Attorneys for Defendants and Cross-Defendants  
CATLIN SPECIALTY INSURANCE COMPANY,  
GREENWICH INSURANCE COMPANY, and  
and XL INSURANCE AMERICA, INC.

26 **IT IS SO ORDERED.**

27 DATED : March 13, 2018

28   
U.S. MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on March 13, 2018, I served via CM/ECF (and/or deposited for mailing  
3 in the U.S. Mail), a true and correct copy of the foregoing **JOINT MOTION TO EXTEND**  
4 **DEADLINE FOR DEFENDANTS AND CROSS-DEFENDANTS CATLIN SPECIALTY**  
5 **INSURANCE COMPANY, GREENWICH INSURANCE COMPANY, AND XL**  
6 **INSURANCE AMERICA, INC., TO RESPOND TO ZURICH AMERICAN INSURANCE**  
7 **COMPANY'S CROSS-COMPLAINT**, (postage prepaid if by U.S. Mail) and addressed to all  
8 parties and counsel as identified on the CM/ECF-generated Notice of Electronic Filing.

9  
10 */s/ Jana Dailey*

11 Jana Dailey

12 An employee of DUANE MORRIS LLP  
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